<u>Remarks</u>

Claims 1-22 are pending in the present application. Reconsideration and allowance are requested in view of the above amendments and the remarks below.

The specification is objected to as allegedly failing to provide proper antecedent basis for the claimed subject matter. In particular, the Examiner alleges that there is "no clear disclosure as to what constitutes a recordable medium." Applicants respectfully disagree and submit that examples of media that can be read by a computer and that can have data recorded thereon are disclosed, for example, in paragraph [0035] of the specification (e.g., magnetic media, optical media). The use of such recording media is well within the purview of one skilled in the art.

Claims 15-21 are rejected under 35 U.S.C. 101(a) because the claimed invention is allegedly directed to non-statutory subject matter. Claim 15 has been amended to address the rejection under 35 U.S.C. 101(a).

Claims 1-22 are rejected under 35 U.S.C. 102(b) over Benson (U.S. Patent No. 5,819,272). This rejection is defective because Benson fails to disclose each and every feature set forth in the claims as required by 35 U.S.C. 102(b).

Independent claim 1 recites:

"A method for preventing an unread activity from being bounced-back to an originating server during a replication operation, comprising:

10/737,341

- 8 -

storing an identification of an originating server of a replicated unread activity in an unread log of a receiving server; and

during a subsequent replication process initiated by the receiving server, preventing replication of the unread activity back to the originating server."

The Examiner alleges that the step of "storing an identification of an **originating** server of a replicated unread activity in an unread log of a **receiving** server" corresponds to the "Per_User_GUID 36" disclosed in column 4, lines 16-18 of Benson. This is incorrect. On the contrary, Benson's Per_User_GUID 36 is the "identifier of the **replica** server to which the master copy was last copied." Thus, the Per_User_GUID 36 identifies a receiving server, not the server that originated the data that is replicated as set forth in independent claim 1 of the present patent application.

The Examiner further alleges that the process of opening communication with an assigned replica, as disclosed in column 4, lines 43-49 of Benson, corresponds to the claimed step of "during a subsequent replication process initiated by the receiving server, preventing replication of the unread activity back to the originating server." This is also incorrect. On the contrary, this section of Benson discloses that if the Per_User_GUID in the master copy is different from the GUID of the replica server (see step 54, FIG. 3), the per user read/unread data is copied to that replica (see, step 56, FIG. 3). Then, if it is determined that the per user read/unread data has changed (step 62, FIG. 3), that replica's GUID is used as the Per_User_GUID (see step 64, FIG. 3). However, if the
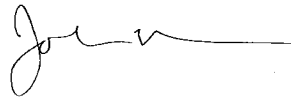
Per_User_GUID in the master copy is the same as the GUID of the replica server, that replica is opened (see step 58, FIG. 3). It should also be noted that this process is not initiated by a replica as set forth in independent claim 1 of the present patent application. Rather, this process is initiated when a user opens a folder on a client (see step 50, FIG. 3).

Independent claims 8, 15, and 22 are allowable for reasons similar to those set forth above with regard to independent claim 1.

Accordingly, Applicants submit that claims 1-22 are allowable.

If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

Dated: September 13, 2006   John A. Merecki
                                   Reg. No. 35,812

Hoffman, Warnick & D'Alessandro LLC
75 State Street, 14th Floor
Albany, NY 12207
(518) 449-0044 - Telephone
(518) 449-0047 - Facsimile

10/737,341